

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

KAPLAN et al.,

Plaintiffs,

against

LEBANESE CANADIAN BANK, SAL,

Defendants.

Case No. 08-cv-07253 (GBD)(KHP)

**NOTICE OF MOTION
TO QUASH**

LELCHOOK, et al.,

Plaintiffs,

against

LEBANESE CANADIAN BANK, SAL, et al.,

Defendants.

Case No. 18-cv-12401 (GBD)(KHP)

PLEASE TAKE NOTICE that, upon the annexed Declaration of Mark P. Gimbel, the exhibit thereto, and the accompanying memorandum of law, all dated January 13, 2023, non-party Covington & Burling LLP, by and through its undersigned attorneys, respectfully moves this Court, before the Honorable George B. Daniels, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 11A, New York, New York, 10007, as soon as counsel may be heard, pursuant to Federal Rule of Civil Procedure 45(d)(3) for an Order quashing the subpoena duces tecum directed to Covington & Burling LLP and issued in connection with *Kaplan et al. v. Lebanese Canadian Bank, SAL et al.*, Case No. 1:08-cv-07253 (GBD)(KHP), and *Lelchook et al. v. Lebanese Canadian Bank, SAL et al.*, Case No. 1:18-cv-12401 (GBD)(KHP), and for such other and further relief as the Court deems just and proper.

Date: New York, New York
January 13, 2023

Respectfully submitted,

COVINGTON & BURLING LLP

By: s/ Mark P. Gimbel
Mark P. Gimbel

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